

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

United States Courts
Southern District of Texas
FILED

MAY 15 2003

Michael N. Milby, Clerk

IN RE ENRON CORPORATION §
SECURITIES AND DERIVATIVE & § MDL 1446
"ERISA" LITIGATION §

MARK NEWBY, et al., §
§
Plaintiffs, § CIVIL ACTION NO. H-01-3624 ✓
§ AND CONSOLIDATED CASES
v. §
§
ENRON CORPORATION, et al., §
§
Defendants. §

PAMELA M. TITTLE, on behalf of herself §
and a class of persons similarly situated §
et al., §
§
Plaintiffs, §
§
v. § CIVIL ACTION NO. H-01-3913
§
ENRON CORP., an Oregon Corporation, §
et al., §
§
Defendants. §

**DEFENDANT LOU L. PAI'S JOINDER IN THE OUTSIDE DIRECTOR
DEFENDANTS' MOTION FOR PROTECTIVE ORDER**

Defendant Lou L. Pai respectfully joins in the motion and the arguments presented in the Outside Director Defendants' Motion for Protective Order ("the Motion") in order to shield from discovery certain categories of private information. Mr. Pai was served with the identical

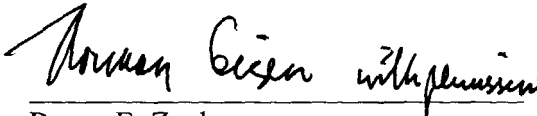

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document requests on May 17, 2002. He requests that the Court permit the same relief as requested in the Motion with respect to the documents that he will produce.

Respectfully submitted,

ZUCKERMAN SPAEDER LLP

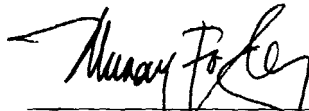
By:

 *with permission* 

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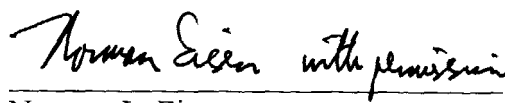



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Attorneys for Defendant Lou L. Pai

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this pleading was served on all counsel of record on the Service List on May 13, 2003 via posting to www.esl3624.com in compliance with the Court's Order Regarding Service of Papers and Notice of Hearings Via Independent Website.

 *with permission* 
Norman L. Eisen